

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**AMPEX CORPORATION'S MOTION FOR SUMMARY JUDGMENT THAT
U.S. PATENT NO. 4,821,121 IS NOT UNENFORCEABLE DUE TO ALLEGED
INEQUITABLE CONDUCT FOR FAILURE TO DISCLOSE THE QUANTEL
DLS6000, QUANTEL PAINTBOX, OR AMPEX AVA SYSTEMS**

Pursuant to Fed. R. Civ. P. 56, Plaintiff Ampex Corporation (“Ampex”) hereby moves for summary judgment that the patent-in-suit, U.S. Patent No. 4,821,121, is not unenforceable due to alleged inequitable conduct for failure to disclose the Quantel DLS6000, Quantel PaintBox, or Ampex AVA systems. The grounds for this motion are set forth in Ampex Corporation’s Opening Brief In Support Of Motion For Summary Judgment That U.S. Patent No. 4,821,121 Is Not Unenforceable Due To Alleged Inequitable Conduct For Failure To Disclose The Quantel DLS6000, Quantel PaintBox, Or Ampex AVA Systems, filed herewith.

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May 23, 2006

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on May 23, 2006, I caused to be electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

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